MINUTES OF THE SIGNIFICANT ECOLOGICAL AREA TECHNICAL ADVISORY COMMITTEE (SEATAC) MEETING OF 6 July 2009

(Minutes approved on 21 August, 2009.)

PERSONS IN ATTENDANCE:

SEATAC MEMBERS
Dr. Jonathan Baskin (present for OVOV)
Dan Cooper
Ty Garrison (absent)
Scott Harris
Michael Long (absent)
Dr. Thomas Scott (via teleconference for Tesoro)
Dr. Cheryl Swift (absent)

REGIONAL PLANNING STAFF
Dr. Shirley Imsand (SEATAC coordinator)
Steven Mar (SEATAC coordinator)
Rudy Silvas (Tesoro)
Alejandrina Baldwin (Tesoro)
Mitch Glaser (OVOV)
Marshall Adams (OVOV)

Tesoro del Valle, VTTM 51644, CUP 92-074
No representative

Santa Clarita Valley Area Plan and One Valley, One Vision (OVOV)
Presented by Mitch Glaser and Marshall Adams of Dept. of Regional Planning

MINUTES pagination:

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NOTE: SEATAC MEETINGS ARE INFORMAL WORKING SESSIONS. MEMBERS ARE APPOINTED VOLUNTEERS IN AN ADVISORY CAPACITY. MINUTES ARE PREPARED BY PLANNING STAFF PRIMARILY FROM NOTES. SESSIONS ARE ALSO TAPE RECORDED BUT THE TAPES ARE PRIMARILY FOR BACK-UP USE BY STAFF. VISITORS ARE ADVISED TO TAKE PROPER NOTES AND/OR RECORD THE SESSION. ISSUES NOT DISCUSSED BY SEATAC DO NOT IMPLY TACIT APPROVAL. NEW OR CLARIFIED INFORMATION PRESENTED IN SUBSEQUENT SUBMITTALS MAY RAISE NEW ISSUES AND MAY REQUIRE FURTHER ANALYSIS. MINUTES ARE GENERALLY APPROVED AT THE NEXT SEATAC MEETING. DRAFT MINUTES MAY BE REQUESTED BUT ARE SUBJECT TO REVISION.

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MINUTES

AGENDA ITEMS

1. **Minutes** of **8 September 2008,** revised upon Centennial Founders request to include reference to discussion in the appendices, were discussed. Dr. Thomas Scott made a motion to approve these minutes (because corrections and additions were made according to SEATAC recommendations at the March 2009 meeting) and Scott Harris seconded the motion for approval.
Minutes of **11 May 2009** were approved via electronic-mail.
Minutes of **1 June 2009** will be reviewed and approved via e-mail.

OLD BUSINESS:

2. Project Description: Tesoro de Valle, VTTM 51644, CUP 92-074

Applicant: John E. Evans of Montalvo Ventures for Tesoro del Valle

Biologists: Marc Blain of BonTerra Consulting

This project is a revision to Vesting Tentative Tract Map No. 51644. Primary access is by Tesoro del Valle Drive or Avenida Rancho Tesoro, which both connect to Copperhill Drive, in an area just north of Santa Clarita and northwest of Saugus. The Angeles National Forest is approximately 3,000 ft. north of the northernmost project boundary; Castaic Lake is approximately 2 miles to the northwest. Vesting Tentative Tract Map No. 51644 is part of an original 1,795-acre site. Tesoro del Valle was originally approved in 1999 for 1,791 residential units (898 single-family lots and 893 multi-family units). Also approved are 6.2 acres of commercial use, 61.8 acres of active parks, a 13.9-acre recreation center area, an elementary school, a historical site (Harry Carey Ranch Interpretive Center), a 1.5 acre lot for a fire station, a sewer lift station, water quality/retention basins, and permanent open space. Residential development was approved over four phases (A,B, C and D) of the project site, with 1,552 units for Phase A, 122 units for Phase B, 115 units for Phase C, and 2 units in Phase D. Phase A of the map was to be constructed with 1,552 units, but has only been completed with construction of 1,077 residential units (both single family and multi-family units). An additional estate lot slated for one unit was also proposed for Phase A and will be constructed through existing entitlements. There is a remaining balance of 474 un-built residential units in Phase A, which the applicant is proposing to transfer and develop in Phases B & C. The proposal includes the transfer of 68 units from Phase A to Phase B, for a total development of 190 residential units in Phase B, and a transfer of 406 units from Phase A to Phase C, for a total of 521 residential units in Phase C. All of the units built in Phase A (1,077 units), and the additional units including those 474 units transferred from Phase A to Phases B & C (711 units total), along with the one (1) estate lot in Phase A and two (2) additional estate lots approved in Phase D, total the 1,791 units proposed for the revised map. The applicant desires to maintain the originally approved entitlement for 1,791 units, and applications for a plan amendment and zone change have been withdrawn for the proposed transfer. This project includes (1) the application for revision to the Vesting Tentative Tract Map No. 51644, and (2) a Conditional Use Permit (CUP 92-074) application for development within a Significant Ecological Area within the revised map boundaries and for Hillside Management/Density Controlled Development, which will address the transfer of the units. The revised grading plan is for 11,406,000 cubic yards of cut and 11,171,500 cubic yards of fill, all to be balanced on-site. No importation of fill is proposed. Parks, recreational facilities, equestrian/hiking trails and open space will be proposed throughout Phase C. The San Francisquito Canyon Significant Ecological Area (SEA #19) traverses across the eastern section half of Phase C, and through Phase D where an Arizona type crossing is proposed across the creek. The applicant has eliminated the HH Street Road bridge over San Francisquito Creek on the revised map in Phase D. Instead, a private driveway or raised Arizona crossing with

culverts will be installed. The third main entry to the project area required for emergency access by the Fire Department will be at NN Street/West Creek Road in the Phase A area, and a final fourth entry point is also allotted in Phase B with a connection to G Lane. Development of the remaining Phases B & C will require annexation of those areas into the Castaic Lake Water Agency jurisdiction, and annexation and service into the Newhall County Water District.
The open space area of Phase C, and the proposed crossing in Phase D are located within the San Francisquito Canyon Significant Ecological Area (SEA #19).

SEA RESOURCE DESCRIPTION: San Francisquito Canyon possesses two populations of the Unarmored Threespine Stickleback (***Gasterosteus aculeatus williamsoni***). This species was formerly found in the Los Angeles, San Gabriel, and Santa Ana Rivers, but is now restricted to the Santa Clara River and San Francisquito Canyon. For this reason, the stickleback has been placed on both the state and federal endangered species lists. In San Francisquito Canyon, it is confined to streams and pools south of Drinkwater Reservoir and to streams and pools north of Baird Canyon. The lower population is dependent on legally mandated water release from Drinkwater Reservoir.
The watershed that supplies San Francisquito Canyon is relatively undisturbed. The hillsides support a dense cover of coastal sage scrub and chaparral. The San Francisquito stream course is chiefly natural with a good riparian woodland community. The health of this drainage is evidenced by the fact that, in addition to supporting the unarmored threespine stickleback, the creek has been classified as an active trout fishing stream by the National Forest Service and the California Department of Fish and Game.
The primary concern for the survival of the Unarmored Threespine Stickleback is the maintenance of its habitat. The fish requires clean, free- and slow-flowing perennial streams and ponds surrounded by natural vegetation. Intermittent areas where surface water connects perennial streams are important during the wet season. The natural vegetation along the intermittent portion of the stream slows heavy runoff during the rainy season, decreases destruction and siltation of habitat in downstream areas, and provides habitat for migration between populations.
The Unarmored Threespine Stickleback populations in San Francisquito Canyon are the only ones for which the possibility exists to plan and control development in the majority of the watershed. This is certainly not true for populations in the Santa Clara River Valley.
Status: The majority of San Francisquito Canyon lies within the Angeles National Forest. However, much of the land is privately owned. The major developments in the canyon are the Los Angeles Aqueduct, the San Francisquito Road in the canyon bottom, and the community of Green Valley.
Buffer Zone Requirement: Development in the watershed feeding San Francisquito Creek must not be allowed to change natural drainage patterns, or to increase runoff and water pollution. Hillside development should be limited and tightly controlled. Impacts must be analyzed for their cumulative, not piecemeal, effects on the habitat.

Compatible Uses: Very low intensity recreational uses are compatible with most of the resources in the area. Fishing is compatible throughout most of the canyon, and should be conducted according to the rules and regulations of the National Forest Service and California Department of Fish and Game. However, use of the pools below Drinkwater Reservoir and above Baird Canyon, both of which contain populations of the endangered Stickleback, should be restricted to regulated scientific study only.
Contact should be made with the Unarmored Threespine Stickleback Recovery Team to keep abreast of current programs and changes in the status of the species.

The previous SEATAC meetings for the project occurred on 14 September 1994, 1 February 1993, 5 April 1993, 3 May 1993, 6 June 1993, 11 May 2009, and 1 June 2009. An ERC (LA County Environmental Review Committee) review of the revised project occurred on 13 March 2007.

Action Requested: **Review of Biological section prepared in September 2008 for a Supplemental Environmental Impact Report (SEIR). Applicant is pursuing approval of the project with the SEIR under Article 10 of CEQA Guidelines Section 15163.**

Tesoro responses to previous SEATAC comments and questions were distributed, but were not discussed at this meeting. Members will also receive these through electronic mail.

SEATAC Comments:

The athletic fields were approved in conjunction with Phase A and the Tesoro Specific Plan, but the map for the bridge has not been recorded. In the previous plan an approved bridge connected the athletic fields on an alluvial island with the main development. The current proposal is to change this plan. The bridge plan will be deleted and a connection with San Francisquito Road that was to be a driveway is changed to a raised, culverted access.

The bridge is a condition of the plan and must be built. Otherwise a plan revision, a revised Exhibit A, is needed that presents a new plan for the bridge, the driveway, and the athletic fields on the alluvial island in San Francisquito Creek.

Any alternatives without the athletic fields should be made known publically and to SEATAC.

SEATAC is basically concerned with Project contamination of the SEA, which is located in San Francisquito Creek.

SEATAC Recommendations:

1) **If the bridge is going to be changed, new mitigation measures need to be proposed that are current in concept with what is now known about mitigation. Previous mitigations were designed (in 1999) 10 years ago, and are not completely adequate based on current knowledge.**

2) **It is not sufficient nor correct to say that removal of the bridge plan is a benefit to the SEA. The entire concept of athletic fields and bridges and driveways in the SEA needs to be addressed. Removing one aspect of the planned SEA impact does not make the impact beneficial.**

3) **This is new construction in an SEA. SEATAC and the County need information on the impacts and details of mitigation measures proposed. Especially important are details on how turf will be managed with respect to runoff. Management of impacts from turf maintenance need to be discussed and options need to be presented.**

4) **The report seems to indicate that the current plans will discharge runoff into the San Francisquito Creek and the SEA from both the Project Phases B and C and the athletic fields in addition to using on-site water control basins. This is deduced from the statements regarding energy dissipators to be installed to eliminate problems of erosion to off-site discharge areas. Unfortunately, there was no representative from the applicant who could explain what is planned or intended.**

5) **Control of runoff and water recycling of 100% (cleansing of runoff capture and reuse in irrigation until evaporation claims all) will be very important. There should not be artificial irrigation runoff into the stream, but natural rainfall should be permitted if that can be done.**

6) **An estimate of the turf irrigation runoff was made by one of the SEATAC members: 12 million gallons in a year using a probable irrigation amount for Santa Clarita climate, 8 million gallons in a year using the lesser figure for coastal slope average. This is enough to convert parts of the stream to perennial water.**

27.9 acres X 6.272 X 10^6 sq.in./acre X 54 in./yr irrigation X 30% runoff X 0.00432900433 gal./cu.in.

54 in./yr. uses the appropriate figure for Santa Clarita Valley, a somewhat arid part of the Coastal slope. 36 in./yr. would be what is needed in an average coastal regime.

27.9 acres X 6.272 X 10^6 sq.in./acre X 36 in./yr irrigation X 30% runoff X 0.00432900433 gal./cu.in.

7) **This will be so expensive. Perhaps the Project has a plan to conserve water, but unfortunately, no representative was present to explain the plan.**

8) **Astroturf or artificial turf, a plastic, impermeable surface for the athletic fields was discussed as an option, but SEATAC members believe that it's not a viable option, since it is tantamount to placing a giant tarp over the ground permanently. Artificial turf would not be compatible with position in an SEA. Playa Vista development placed it in a former wetland as a soccer field. If it had been turf, that turf could have been managed to support wintering ground-feeding songbirds, for example, or native fauna at its margins. The Astroturf did none of these.**

9) **Complete capture and reuse of runoff is a measure that is suggested. This was successfully implemented for Starr Ranch by Dove Canyon Golf course in southern Orange County. They installed a pumping station.**

10) **Discussion and mitigation options are needed for urban runoff and water recycling. Urban runoff from turf may introduce fertilizer, pesticides, and excess water that will change the stream habitat. The natural condition is a stream regime that is seasonally dry in most years. The seasonal dryness and dynamic change of banks and bottom is a feature that fauna and flora are adapted for and even require. Changing the creek dynamics will be multiple impacts that could extirpate the endangered Unarmored Threespine Stickleback (fish) and the California species of concern Western Spadefoot (toad).**

11) **Bank stabilization is going to change the velocity, erosion, water cycle, and much of the creek dynamics. This needs to be analyzed with respect to a dramatic change in habitat for the endangered Unarmored Stickleback (fish) and California species of concern, the Western Spadefoot (Toad). Other riparian species also will be affected and should be analyzed.**

12) **New plant and animal species that currently do not exist in the area will be introduced so that the stream habitat will change for both the Stickleback and the Western Spadefoot as well as other species in their habitat. A perennial creek would begin to grow cattails and tules that would slow the water and change its constituent flora, fauna and chemical composition. Predators, such as crayfish and bullfrogs, are likely to invade the area. Both the stickleback and the toad are taken by the crayfish and bullfrog, and both are recorded from currently proposed Phases, upstream of the alluvial island.**

13) **Catch basin design is very important. Previously designed swales and catch basins, if perennially wet, tend to become refugia for exotics. Newhall Ranch projects have catch basins which ideally percolate completely so that wastewater completely recycles. Those designs should be investigated to see if they really work.**

14) **Alluvial fan scrub is adjacent to the alluvial island, and is probably what naturally occurred on the island before it was used for agriculture. This is a sensitive, rare habitat in California, and the San Francisquito Creek area has best quality in Santa Clarita area of this habitat. Impacts for the adjacent areas need to be discussed. The habitat, including the island area, provides habitat for San Diego black-tailed jackrabbit, a California special species of concern now very rare in the coastal area of Los Angeles County. This needs to be discussed.**

15) **Lighting of the soccer field and bridge or driveway will be an impact to wildlife and flora of the area. Lighting from Phases B & C will also impact the SEA. This should be discussed and mitigated as much as possible.**

16) **There is not enough information in the EIR to really know if the SEA will be impacted or not. Management of Phases B and C would need to be more fully outlined to say whether the SEA is impacted.**

17) Overall, the Project EIR is too generalized. More specifics are needed that refer especially to species impacted and mitigation for them. Mitigations need to be delineated in detail in the EIR so that CEQA-mandated public review can help to form them into truly effective, adequate mitigations. Otherwise the single County Biologist and an Environmental Planner would need to do this for all later approvals, and they may not have specialty knowledge or time to do effective, adequate review. The process could be much more efficient if details were spelled out in the EIR so that public comment could weigh on the proposed Project.

18) The EIR or an appendix should give a long-term management and monitoring plan for the biological resources of the Project, including the SEA. Description needs to be detailed for the following points:

a. Who will manage the preserved and mitigation areas? Home owner associations tend to have different objectives from preservation, and are NOT the best organization to manage.

b. Who will monitor the mitigation and preservation?

c. Funding for management and monitoring should be described, should be bond posted by applicant.

d. The preservation area should be protected and cared for if there is an interval between approval of development and management for conservation.

e. Provision for fencing, signage, patrol should be clear.

f. Preservation in perpetuity should be achieved through deed to a conservation organization of the preserved and mitigation areas if at all possible.

g. The management program of the conservation organization should be described.

h. Residents of any development should be provided with education about their natural environment, its importance, its care. Education should be planned.

i. There should be a plan for SEA protection from a large suburban population's activities.

19) There should be provision for long term monitoring bonds to be posted and used in event of applicant financial demise, so that monitoring and mitigation can proceed to completion. Some Coastal Sage Scrub areas have had long periods or care (about 20 years) and are beginning to show signs of maturity, such as acquiring California Gnatcatchers. This is positive proof that a good mitigation plan can work, but it may take a long time for them to work.

20) Urban runoff and percolation from the project is not known and should be studied to determine if it will contribute to change in Santa Clara River natural dynamics. Runoff and percolation could have the same deleterious impacts from the Project as runoff from the athletic fields. The Project EIR needs to discuss options and mitigation for water treatment and study where the percolation basin water surfaces.

21) Oak woodland mitigation has not been properly delineated.

22) Preservation of habitat that has Mariposa Lilies is the highly preferred mitigation. Reintroduction to a habitat that once had them would be next best. Transplantation is better than nothing, but it does not entirely mitigate to a level of no significance. It is experimental. Thus, the impact to Mariposa Lilies has to be judged "significant and unavoidable."

23) Transplantation is a very problematic mitigation solution. The very act of transplanting and caring for the transplants is an impact of trampling and disturbance to the transplant area. Whatever was in the transplant area initially is affected. Identifying a suitable area for transplanting is difficult, knowing that if it is truly suitable, the plant would already be there. Rare plants tend to have very special requirements, not easily fulfilled in lots of places. Long term management will be needed for almost any transplant.

24) Loggerhead shrike is a very uncommon species of concern in Southern California that is recorded from the Project site. Removal of this species' breeding habitat needs to be discussed.

ACTION TAKEN: SEATAC ruled that the Project in current design is incompatible with the SEA.

NEW BUSINESS:

3. Discussion of the Preliminary Draft and Screencheck Environmental Impact Report (SEIR), Santa Clarita Valley Area Plan, One Valley, One Vision.

Presentation by Department of Regional Planning staff members, Mitch Glaser and Marshall Adams, of the Countywide Studies Section.

Notes on presentation:

The Countywide Studies Section of Regional Planning deals with planning in the northern part of County, chiefly the 5th District. The Santa Clarita Valley Area Plan covers both the unincorporated areas of the County and the incorporated areas of the City of Santa Clarita. Technically there are two separate policy reports due to legal restrictions (the County's report and the City of Santa Clarita's report), but they hold many similarities since they were both jointly developed. The Area Plan is updated every 10-20 years and was last updated in 1990. This update would be expected to last 10-20 years also. The Plan is a tool for staff evaluation of projects, giving a general update on goals and description of new policies and retained old policies. It describes goals, policies, implementation actions jointly developed. It gives detail on circulation, open space, conservation, green building ordinance, water supply issues, global warming. The County has more new development on vacant ground and has more description of policy on this. The City has more redevelopment and has more description of policy for that. Very few discrepancies probably exist. The EIR explains impacts of the plan and any mitigations of those impacts.

Land Use categories were updated. The average density of the plan is RL 2-1, 2 residential units per 1 acre, and ranges between RL 1-1 (1 unit/acre) to RL 30-1, 30 units/acre. In general the high densities such as RL 20-1, are in previous developments or approved entitlements. The hillside management policy is replaced with standard rural categories rather than a range. The range generated by current hillside development ordinances is a source of confusion, flexibility, and arbitrary inconsistencies due to bargaining and controversy. With adoption of the OVOV plan, new density would be reduced by about 10% from density currently permitted. Most of this reduction happened in areas planned for RL 20-1. Expansion of SEA boundaries is proposed, and the number of properties that would be affected by these new boundaries will approximately triple.

The importance of the document is that subsequent decisions by the Regional Planning Commission and Board of Supervisors need to be consistent with the Land Use Map and with the policies and goals of the Plan. Projects which are not consistent with the map must ask for amendment to the map. Usually it is density that is amended. About 40 thousand housing units have been approved in various specific plans in the area, which is very close to the growth for next 20 years predicted by SCAG (Southern California Association of Governments), so there was apparently no need for higher densities. Biological resources weighed heavily in considerations of density. All approved plans are recognized in the Plan.

The Plan is available on the DRP website: http://planning.lacounty.gov/ovov

The City EIR does not have a screencheck, and will have a separate release and hearing on EIR.
* SEATAC would appreciate notification.

The request from Countywide Studies is that SEATAC focus on the EIR, its technical accuracy, its analysis, and sources. A second meeting with SEATAC can be arranged around the time of EIR release if SEATAC would like.

SEATAC Recommendations:

1) **The Santa Clara River is the most important biological resource of the area, far more important than it appears in the documents. The current policies and permitted development are moving it towards a concrete-lined ditch. This will destroy the River function, and it will compromise all adjoining areas that the**

Plan does say should be preserved. The Plan appears to be eliminating habitat along the River.

2) **The Unarmored Threespine Stickleback (fish) has been one species that has been used to save some of the River function. It is important to correctly describe its needs. Its preservation is critical.**

3) **On page 3.7-16 it is stated that stickleback fish are limited to permanent streams in the Santa Clara River. This is incorrect. The statement should say that stickleback can thrive in any place with clean, flowing surface water whether it be a permanent or temporary stream, from Arrastre Canyon near Acton to beyond the County line and Salt Creek into Ventura County. An example of the temporary nature of habitat to which the fish are adapted is Castaic Creek. Dry in the summer, Castaic Creek is a good place to find Stickleback in the winter during the rainy season.**

4) **The listed areas where fish occur are incomplete. Bouquet Canyon Creek needs to be included as stickleback habitat. The mouth of Bouquet Canyon is important Stickleback habitat.**

5) **There is a Dry Gap area which divides Unarmored Threespine Stickleback habitat from congeners in Piru Creek and other perennial areas of the River. This is an important area to keep dry, as interbreeding might destroy the subspecies.**

6) **Plans for recycling water should be clearly described and precisely calculated. The balance of water is very important for the Stickleback. Currently groundwater that would have contributed to the historic Santa Clara River is pumped for use by the urban area or locked up for use behind Castaic Dam. The River flow has been replaced by outflow from water treatment plants. Plans for recycling the treated water should be described in the plan and calculations should demonstrate that there will be flow that supports the fish habitat. The recycled water plans are not mentioned in the biological resources section nor the hydrology section.**

7) **The biological information in the report seems to be questionable in many instances, judging from experience of the SEATAC members. The lack of citations from peer-reviewed literature is a block to checking information or knowing that the information was checked. Errors get memorialized in consultant reports when they are repeated in report after report.**

8) **SEATAC states that it would be helpful if citations pertaining to biological information were given in the SEIR. Citations should be from peer-reviewed publications whenever possible. Consulting company reports are unreviewed, rarely corrected, and may misrepresent the situation because they are developed for a special interest. This is a problem because the general public may not perceive the difference in level of exactness. Peer-reviewed information is much more credible.**

9) **All in-house documents of County and Impact Sciences should be made available to SEATAC and to the public on a website. Do not use any citation for which no**

hard copy can be supplied. Hard copies should go to libraries with the EIR distribution.

10) **SEATAC questions whether there may be a conflict of interest for the company that is responsible for the report, Impact Sciences, because they also are the consulting company preparing documents for the largest development of the area, which is Newhall Land and Farming. Newhall Ranch development would have an interest in having a permissive document. Although they did not prepare the text, they are responsible for its accuracy. The EIR should be a clear statement of impact, and the biological section seems "very light." In particular SEATAC questions the lack of emphasis and failure to clearly state the magnitude of impacts to the Santa Clara River and what this will mean for the biology of the entire watershed of the River.**

11) **SEATAC recommends careful revision of the biota section where the words "common" and "abundant" occur. Most of the species discussed are considered rare and uncommon, although there may be localized groupings. More exact details are needed to properly delineate species occurrences. "Abundant" and "common" probably should not be used.**

12) **Mention the feasibility of land acquisition as mitigation for loss of habitat for listed species (endangered and threatened, listed by CNPS, California Native Plant Society).**

13) **SEATAC recommends that the report examine probable effectiveness of mitigation measures that are proposed.**

14) **Development should be minimized in the SEAs, which designate the most valuable biological resources of the area, the Santa Clara River and tributaries. One unit per five acres (RL 5-1) is too dense for this area. It is an active flood plain, and really no construction should occur there.**

15) **The City will have high density near the Metrolink hubs. This is an example of an area that should be low density because it is an active flood plain. Metrolink hubs should be relocated away from the active floodplain.**

16) **SEATAC recommends requiring both mandatory reporting of compliance and mandatory reporting of non-compliance with mitigation measures and biological monitoring to the lead agency.**

17) **SEATAC states that a Land Use map showing the City of Santa Clarita zoning would be useful in judging the whole picture. The yellow code for urban, not necessarily approved, might be divided into approved and not approved.**

18) **SEATAC recommends including maps and/or map layers that show SEAs, critical habitat for listed species such as the California Gnatcatcher and Red-legged Frog, location of the wildlife corridor designed by South Coast Wildlands. There is also essential habitat for the stickleback that should be plotted (recommended as critical but never approved).**

19) **More than one wildlife corridor is important to include, possibly along main tributaries. The River itself should remain a wildlife corridor. It is clear that wildlife corridor(s) were not considered in assigning density.**

20) **There should be goals of providing for land acquisition to facilitate River preservation (the main wildlife corridor) and others along tributaries. The Plan is the opportunity to examine the issue of the River preservation in area scale rather than on a case by case basis, where the big picture is lost.**

21) **Fuel modification zones need to be totally on private land. Development next to public land in the National Forest should be shown, with the requisite 200- or 300-foot zone needed for fuel modification clearly depicted on the development side, NOT on the public land side. The Plan should make clear that development must contain all fuel modification. Development should avoid *de facto* condemnation of public land for fuel modification. The Forest Service has a policy of doing such fuel modification (Neighborhood Protection Zones), but it should not be compelled to do this.**

22) **Fuel modification zones should not be used for mitigation of vegetative impacts. Continual disturbance and impact for brush clearance means these areas will never be natural. Mitigation areas should be in preserved areas, not a continually impacted one.**

23) **A significant impact that the EIR seems to have totally missed is that increased development will cause encroachment upon high fire hazard areas, increased ignition sources, and cause more frequent fires in areas peripheral to the developed area. This will cause type conversion of vegetation, which will majorly impact biodiversity. This impact should be thoroughly discussed and mitigated as possible. It will still be significant.**

24) **Open space in this plan is very fragmented. Connectivity would be valuable and meaningful to wildlife and plants.**

    Planners explained that the low density designated zones are the way they dealt with the issue of public condemnation of private land. By creating low density such as 1 residence per 20 acres, planning can avoid biological resources.

    Why not have a plan that allows buyout at current price of flood plain properties by government when owners are ready to sell?

25) **Vernal pools are found in Vasquez Rocks County Park, as well as Cruzan Mesa, and this should be corrected. (Vasquez Canyon does not have vernal pools.) There are several other locations with vernal pools which should be mapped and discussed.**

26) **A potential source for information would be public agencies. The Fish & Wildlife Service recently came out with a report on Stickleback, which could be used to update your EIR.**

ACTION TAKEN: The above comments and recommendations were taken into consideration by Department of Regional Planning staff members Mitch Glaser and Marshall Adams of the Countywide Studies Section.

OTHER MATTERS

4. **Public comment** pursuant to Section 54954.3 of the Government Code.

   No public comments were made.